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(*Pro Hac Vice* Pending)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

Imperial Pacific International (CNMI) LLC,

Plaintiff,

Vs.

Commonwealth of the Northern Mariana Islands, Arnold Palacios, governor of CNMI, in his official and personal capacities; Edward C. Deleon Guerrero, Chairman of CCC, in his official and personal capacities; Rafael S. Demapan, Vice Chairman of CCC, in his official and personal capacities; Mariano Taitano, Commissioner of CCC, in his official and personal capacities; Martin Mendiola, Commissioner of CCC, in his official and personal capacities; Ramon M. Dela Cruz, Commissioner of CCC, in his official and personal capacities; Andrew Yeom, Executive Director of CCC, in his official and personal capacities;

Defendants.

Case No. 1:24-cv-00001

**DECLARATION OF MICHAEL
CHEN IN SUPPORT OF PLAINTIFF'S
EMERGENCY MOTION FOR
TEMPORARY RESTRAINING
ORDER**

I, Michael Chen, hereby declare:

1. I am over the age of eighteen, competent to make this declaration, and all statements made in this declaration are based on my personal knowledge unless specifically indicated otherwise.

2. I am a member of the State Bar of California and Utah, counsel for Plaintiff in the above entitled action, pending approval of the *Pro hac vice* application by the Court.

3. On Friday, February 23, 2024, at approximately 12:30 PM, Saipan local time, I emailed Assistant Attorney General Keisha Blaise and advised her that IPI intends to file an Emergency Motion for a TRO on Monday, February 26, 2024.

4. On Monday, February 26, 2024, at approximately 9:30 AM, Saipan local time, I transmitted by email a copy of the Emergency Motion, Memorandum of Law, Declaration of Howyo Chi in the above entitled action to Assistant Attorney General Keisha Blaise, who represents the Commonwealth of Northern Mariana Islands, and Commonwealth Casino Commission in its revocation proceedings against Plaintiff.

5. On Monday, February 26, 2024, at approximately 9:45 AM, Saipan local time, I contacted Ms. Blaise by telephone to inform her of Plaintiff's anticipated filing in the above entitled action.

6. On Monday, February 26, 2024, at approximately 10:00AM, Saipan local time, I caused a copy of Plaintiff's complaints for Case No. 1:24-cv-000001 and 1:24-cv-00002, Emergency Motion, Memorandum of Law, Declaration of Howyo Chi in the above entitled action, together with a cover note describing the documents contained within, to be hand delivered to the offices of the Commonwealth Casino Commission at P.O Box 500237, Saipan, MP 96950.

7. On Monday, February 26, 2024, at approximately 10:30AM, Saipan local time, I caused a copy of Plaintiff's complaints for Case No. 1:24-cv-000001 and 1:24-cv-00002, Emergency Motion, Memorandum of Law, Declaration of Howyo Chi in the above entitled action, to be hand delivered to CNMI Attorney General Office at Hon. Juan A. Sablan Mem. Bldg., 2nd Floor, Saipan, MP 96950, attention to Assistant Attorney General Keisha Blaise.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 26th day of February, 2024.

X: Michael Chen
Michael Chen

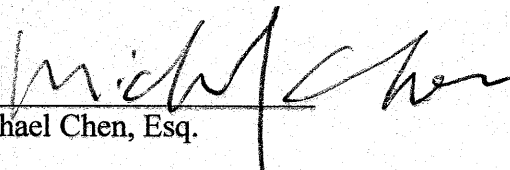
Executive Director Andrew Yeom
Commonwealth Casino Commission
Unit 13 & 14F
Springs Plaza, Gualo Rai
P.O. Box 500237
Saipan 96950,
Northern Mariana Islands
Re: Emergency Relief in United States District Court for the Northern Mariana Islands

Dear Executive Director Yeom:

Please find enclosed a copy of two Complaints, Emergency Motion, Memorandum of Law, and Declaration of Howyo Chi, which my client, Imperial Pacific International (CNMI) LLC (IPI), plan to file today in the United States District Court for the Northern Mariana Islands.

By filing these documents, IPI is seeking an order for an emergency injunction against Commissioners and Executive Director of Commonwealth Casino Commission from proceeding with the revocation hearing currently scheduled for February 28, 2024, and from exercising jurisdiction over IPI for disputes arising from the CLA.

Sincerely,

X: 
Michael Chen, Esq.

Attorney for IPI